



## Mars Khaimov Law, PLLC

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### VIA ECF

Honorable Katherine Polk Failla  
United States District Judge  
U.S. District Court  
Southern District of New York  
40 Foley Sq.  
New York, New York 10007

February 15, 2024

**MEMO ENDORSED**

Re: *Case 1:23-cv-04449-KPF Toro v. BigShoes.com, Inc.*  
Request for Adjournment of Conference

Dear Judge Failla:

Plaintiff respectfully submits this letter-motion, with the consent of defendant, to request a brief adjournment of the initial pretrial conference scheduled to take place on February 22, 2024 at 10:30 AM. Plaintiff counsel will be on a flight at the scheduled time of the conference, and unable to join the conference line. As such, Plaintiff request an adjournment of the conference to any date that is convenient to the court in the two weeks following the currently scheduled date. This is the first time this relief is being requested, and both Parties consent.

We thank the Court for the attention and consideration herein.

Respectfully submitted,

/s/ Mars Khaimov  
Mars Khaimov, Esq.  
Attorneys for Plaintiff

Cc: David Stein, Esq.

Application GRANTED. The initial pre-trial conference ("IPTC") in this matter is hereby ADJOURNED to **March 7, 2024**, at **4:00 p.m.**

The Clerk of Court is directed to terminate the pending motion at docket number 20.

Dated: February 16, 2024  
New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE